

Operational Feedback - GIEP1 - Network detail consumption information - Retailer to Distributor, and Distributor to Retailer			
Greymouth: GIEP1, 2, & 12 – the gas industry uses GJs for shipping and balancing not kWh – distributors should tailor gas tariffs to GJs. Decision: Keep optionality of energy unit of measure. Not GJ only. Rational: Most Gas Pipeline Businesses and Gas Retailers operate across both electricity and gas. If GJ is preferred, this can be determined within UoSA. Powerco: Registry Hub should be mentioned as the preferred transport mechanism to supply a GIEP file. Manual (email) should only be used as a last resort due to the inherent security issues. We note that there are more onerous restrictions on the GIEP4 files, even though consumption data is also considered sensitive. Decision: Add to all amended protocols already in place, that use of the Gas Registry for SFTP data transfer is the preference. Email is to remain a secondary alternative with security measures. Rational: We are not changing anything from what already takes place, just tightening up security expectations. The tilde character should not be used as a field separator. In some systems this is a special character, and another character should be used (such as pipe “ ” or dash “-”). Decision: Leave as is. Decision expanded: Log the proposed shift away from using the tilde character as an in-field separator for future consultation and amendments. Will need to determine if industry have a preference to the tilde character, considering our suggested alternative would be a 'space' (i.e. to align with ASCII used in electricity) Rational: This change was not consulted on, and we are ensuring any shift to replace the tilde character would be done so through managed change to avoid operational issues for those currently using this protocol. Ensure there is wider support before implementing any changes. As billed vs normalised (AA norm should be preferred). <i>As-billed is consumption that aligns with billing, as-billed-normalised is billed consumption that is smoothed over consumption periods, aa-norm is consumption based on allocation data smoothed over consumption periods.</i> Decision: Leave as is. Rational: We do not want to influence UoSA negotiations by stating a preference. If there is a preference, that is for participants to determine within UoSAs. As-billed is still relevant, for example distributors may require this format to assist with setting/reviewing network tariffs considering it better aligns to actual billing and demand, which is important for seasonal consumption. Rate unit of measure (include Day) Decision: Include amendment. Rational: The ability to include daily fixed charges is an important component for gas pricing. GIEP1 spec sheet page 4 (text should clarify that AA norm cannot contain negative consumption) Decision: Include amendment Rational: No harm to make it more explicit for the avoidance of doubt. Risks of incorrect negative consumption input can arise from estimation errors between reads. POCO suggested wording: Allocation Agent (AA) normalised reporting cannot contain negative consumption.	Genesis: Delivery mech preference (SFTP), POCO also uses SFTP Decision: Add to all amended protocols already in place, that use of the Gas Registry for SFTP data transfer is the preference. Email is to remain a secondary alternative with security measures. Rational: We are not changing anything from what already takes place, just tightening up security expectations. Add version # feild in header Decision: Add version number in header. Rational: Participants wishing to explicitly state which protocol they are using in UoSA's may wish to make this clear to avoid confusion when either the UoSA's or the protocols are updated. AA norm is preferred. As billed and AB-Norm no longer used and can be removed if redundant by other participants Decision: Leave as is. Same decision as the Powerco answer. Rational: We do not want to influence UoSA negotiations by stating a preference. If there is a preference, that is for participants to determine within UoSAs. As-billed is still relevant, for example distributors may require this format to assist with setting/reviewing network tariffs considering it better aligns to actual billing and demand, which is important for seasonal consumption. Supportive of using comma delimiters to seperate text. Although notes that Vector (UNLG) and FGHL (NGCD) use tabs. Decision: No action Rational: This is a general comment then an operational suggestion. None of the proposed GIEPs or equivalent EIEPs use anything other than commas as delimiters. No scheduled wash-ups sent to GNET. Gasnet run wash-ups on an as-required basis (by ICP) rather than a scheduled wash-up process of all ICPs. Decision: No action Rational: Provides context, but does not suggest any operational changes. They are saying their reporting is not scheduled monthly, rather is on as needed basis. Bluecurrent: Minimal impact on operations. Decision: No action	Genesis: A recent development in the EIEP space may be worth considering with GIEP. The use of DateTime fields in EIEP files is currently DD/MM/YYYY HH:MM:SS. Following work by the EA's Consumer Mobility working group, there is expected to be an EA consultation document published in 2026 that will propose that Date-time fields in the EIEP13a,b,c and EIEP14 use an ISO8601 format (YYYY-MM-DD HH:MM:SS+TZ). The proposal seems to be driven by IT developers rather than a response to participants or consumers. There was no notable objections to the change. There was no discussion on extending the ISO8601 adoption to other EIEP file formats. Decision: No action. Shift this question to GIEP13 and GIEP14. Rational: Align with EA on this amendment. Vector: General comment all protocols - Vector does not support outcomes where voluntary protocol changes effectively require distributors to support multiple formats simultaneously. Decision: No action. Add to change register for future consultations. Rational:This protocol is unchanged from the current published version, so compatibility is maintained for participants already using it. Any move away from the current approach was outside the scope of this consultation. Vector supports the minor amendments in principal, but is concerned the changes are not backwards compatible and may impose material system and implementation costs. Decision: No action. Add to change register for future consultations. Rational: See above comment General comments all protocols - (1) Ensure GIEPs do not necessitate parallel or duel-format support (2) provide clear change logs and implementation guidance for each amended protocol (3) explicitly state if changes are additive and backward compatible or if they will require system and process changes and why this is beneficial (4) maintain robust and consistent privacy and security requirements for customer and consumption data. Decision: No action Rational: See above comment	Nova: (applies to all protocols): Unique file identifier: Who is responsible for creating the unique identifier (e.g. sender)? Decision: The sender is resonsible. Tidy protocol for consistency and clarity with others. Rational: The unique identifier is an internal ID for the sender of the report. For example, a retailer submitting a request creates the unique request identifier, while a distributor sending a response includes the same identifier for linkage. Unique file identifier: What mechanism or governance is proposed to ensure the uniqueness across all participants, rather than one organisation? Decision: No action. Rational: This is a file name for internal reference for the sender. Unique file identifier: Whether there are any constraints or expectations around sequencing, randomness, or re-use? Decision: No action. Rational: There are no constraints around sequencing, random or re-use. It depends entirely how each business wants to set up their own records.

Operational Feedback - GIEP2 - Network summary consumption information - Retailer to Distributor, and Distributor to Retailer

Greymouth:

GIEP1, 2, & 12 – the gas industry uses GJs for shipping and balancing not kWh – distributors should tailor gas tariffs to GJs.

Decision: Keep optionality of energy unit of measure. Not GJ only.

Rational: Most Gas Pipeline Businesses and Gas Retailers operate across both electricity and gas. If GJ is preferred, this can be determined within UoSA.

Genesis:

Protocol not used by Genesis

Decision: No action

Supportive of amendments

Decision: No action

Add version # feild in header.

Decision: Add version number in header.

Rational: Participants wishing to explicitly state which protocol they are using in UoSA's may wish to make this clear to avoid confusion when either the UoSA's or the protocols are updated.

Bluecurrent:

Minimal impact on operations. No comment

Decision: No action

Vector:

Vector supports the changes, subject to the same backward-compatibility principle applying to avoid the need for parallel processing.

Decision: No action. Add to change register for future consultations.

Rational: This protocol is unchanged from the current published version, so compatibility is maintained for participants already using it. Any move away from the current approach was outside the scope of this consultation.

Operational Feedback - GIEP8 - Network price category and tariff change - Retailer to Distributor

Powerco:
It would be good to have the current (old) price category as well as the new. We would prefer use of term ‘proposed price category’ rather than ‘price category’ as this implies that it will change. We suggest changing from ‘Price category change date’ to ‘Effective Date’ to be consistent with electricity terminology.

Decision:
Amend [Rule] column for 'Price category' to align with EA description.
Amend [Description] column for 'Effective Date' away from 'Price category change date'.

Rational: These changes provide better alignment with electricity, and clarification without materially changing what was consulted on.

Annual Consumption: a standard measure for the unit of measure (GJ, or kWh) is required as per the GIEP1. Would be useful to have a UOM field in the file if not a defined/standard measure.

Decision: No action

Rational: There is already a defined standard measure in the existing protocol. The description for this line item is 'Annual consumption in GJ (if known)'.

Rejecting or declining requests: We recommend this file is ‘two ways’ (i.e. notify the retailer or rejection as per electricity) in which case we need a rejection reason field added or alternatively the ‘reason for change’ field could be co-opted.

Decision: No action

Decision expanded: Include this suggestion in future amendments to GIEP8 to consult on. Use EIEP8 as a template.

Rational: Adding a rejection component to this protocol is an entirely new file that was not consulted on. Idea has merit, but needs to be tested with participants.

Genesis:
We support this
Decision: No action

Missing version # in field header row
Decision: Add version number in header.

Rational: Participants wishing to explicitly state which protocol they are using in UoSA's may wish to make this clear to avoid confusion when either the UoSA's or the protocols are updated.

Bluecurrent:
Minimal impact on operations. No comment
Decision: No action

Nova:
Unclear whether GIEP8 applies to all price category changes including Residential, Commercial, and Industrial. If all, then clarification that this is the case would be helpful.

Decision: Amend price category, column [Rule] for further clarity.

Rational: This protocol applies to all connections with published load groups and associated price categories. This has been clarified for *Price Category* in column [Rule].

Our internal system (Orion) does not hold complete or accurate meter type and SCMH (standard cubic meters per hour) data. If these are not registry data items, can these feilds be optional if not available for the retailer? Otherwise it will need to be requested from MEPs each time.

Decision: Amend meter type field to be optional. Keep SCMH as mandatory.

Rational: After a review of published network price categories, no distributor pricing schedule or pricing methodology uses meter type as a determinant of price category or tariff eligibility (i.e. it is not needed other than for verification purposes).

However, SCMH is used for published tariff categories, therefor will remain mandatory. The exception being GasNet (bespoked pricing) and Nova (private networks), who do not publish standard tariff rates.

Nova:
Reason for change field. Needs a standard list to choose from so that automation can take place, without this, it becomes difficult to automate GIEP8.

Decision: No action. Add to change registry for future consultation.

Rational: Assists with automation. Will require another round of consultation.

Vector:
Supportive of this protocol. No further comments

Decision: No action

Operational Feedback - GIEP4 - Customer Information - Retailer to Distributor

Greymouth: GIEP4 – there is no value-add (rather, duplication is the outcome) – the information should be in the gas registry. This GIEP should be dropped. Decision: No action Rational: Industry submissions were largely supportive of this protocol. Benefits cited included, having key baseline customer information to support customer related outcomes. Adding elements of this information into the Gas Registry would require amendments to the Rules. Currently there is not enough drive from industry to make these changes when this information can be covered in a low cost manner through a voluntary protocol.	Contact Energy: Implementation timing (for all protocols is critical) for system changes. Decision: Publish protocols when ready. Keep the old one's published, noting that they may still be in use. No hard go live date, participants can adopt as needed. Rational: Pariticipants will be able to implement the protocols when they deem appropriate e.g. when UoSA are reviewed or as system upgrades take place. Consideration of a dedicated health and safety GIEP could also deliver meaningful benefits for crews and contractors across the sector. CTCT suggests this has been raised in recent Health and Safety forums with increased industry interest in this area. Decision: Keep site hazards as a free text field as circulated during consutlation. Must not relate to personel, only physcial site hazards. Rational: A field that provides an opportunity to operate safely is advantageous for all parties. Genesis has also commented on this: <i>Hazards should relate to the site rather than the customer.</i>	Genesis: Supportive of protocol Delivery mech SFTP should be mandated, personal information, unless agreed by both parties. Decision: No action. Rational: We have aligned exactly with the EA here so the risk assessment of customer data exchange still remains with the participants. Retailers can decide which mechanism to use based on their own risk assement. Can genesis use R Complete Replace in agreed frequency if for incremental changes? If so, can this be made exlicit in the protocol? See following suggestetd amendment: 9. Parties will need to agree whether the file is to be either: a. “snapshot” file that provides customer information for all ICPs with a customer contract as at the report an agreed date, and at an agreed frequency. Can also be used to advise when customer information is amended or added (file type R); or Decision: 1. Yes, R can be used in GIEP4 as a complete file replacement for incremental changes, as agreed between participants. 2. Amend 9. a) to remove ambiguity. Rational: Amending does not remove or narrow functionality, it removes ambiguity. The use of Initial File or Replacement File is at the discretion of what’s determined between participants.	Genesis: Replace fax number field with alternative phone number or contact. Decision: No action. Rational: Some sectors (albiet few) still use fax. For example, in the medical sector fax is still used for cummunications between doctors, pharmacies and hosptial referrals. EIEP now uses MDA/MDR (for Advised or Recorded) instead of MDN/MDV (for Notified and Verified) Decision: Align with the EA on these components. Rational: Amending will not change anything operationally different to what has already been consulted on. It will align better for duel fuel retailers. Removes ambiguity in relation to MDC applications, and those applications coming into effect. Site hazards: consideration of privacy implications. Hazards should relate to the site rather than the customer. Decision: 1. Keep site hazards as a free text field as circulated during consultation. 2. Update protocol text to keep field focused on physical site hazards. 3. Amend [Validation rules] description to keep field focused on physical site hazards. 4. Add to change log for future consultation whether standard fields could be used for this field Rational: A field that provides an opportunity to operate safely is advantageous for all parties.	Vector: Supportive of this protocol. Decision: No action Bluecurrent: Is customer information stored in the gas registry, or is GIEP just a medium through which information is shared? Gas registry use as a data warehouse we do not consider to be appropriate - because data changes so quickly. Decision: No action Rational: Only generalised customer information is stored on the gas registry. It does not include personal information such as medical status or contact details. We agree that Gas Registry should not be used as a data warehouse because it would create more regulatory burden for little industry benefit. In using GIEPs, data is stored temporarily via the protocol exchange process on the recipients FTP inbox then permentantly deleted after one month.
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Operational Feedback - GIEP5B - Unplanned Service Interruption - Distributor to Retailer

Greymouth:

GIEP5B – this is not fit for purpose – retailers should not receive a complicated file if there is an unplanned network outage. Retailers should receive something akin to urgent Oatis notices.

Decision: No action

Rational: Oatis not the right place because of the difference in customer volumes between Oatis vs Distribution networks. Communications about mass market customers is what GIEPs is about, rather than Oatis which is focussed on shippers.

Genesis:

We support this.

Decision: No action

Bluecurrent:

GIEP5B will have minimal impact on our operations. We therefore have no issues with this new protocol.

This information should be considered by retailers and the call centre operators as part of their triage process when no-gas calls are being raised.

Decision: No action

Rational: Informative comment. This protocol has a role to play in facilitating information relating to no-gas calls from customers.

Vector:

Vector supports GIEP5B as an available standard format, with secure transfer and Privacy Act obligations.

Decision: No action

Rational: Supportive if existing security remains.

Operational Feedback - GIEP12 - Delivery price change notification - Distributor to Retailer

Greymouth: GIEP1, 2, & 12 – the gas industry uses GJs for shipping and balancing not kWh – distributors should tailor gas tariffs to GJs. Decision: Keep optionality of energy unit of measure. Not GJ only. Rational: Most Gas Pipeline Businesses and Gas Retailers operate across both electricity and gas. If GJ is preferred, this can be determined within UoSAs. Powerco: Powerco has a number of individually ICP priced sites over most allocation groups (we classify these as “non-standard individually priced sites”). These often share the same price category code. As they are individually priced at an ICP level they cannot be uploaded in the GIEP12 format required. We suggest adding to the “Description of when this protocol applies”: [A distributor may, but is not required to, use this protocol where consumer ICPs are individually priced.] Decision: Include suggestion. Extend flexibility to all individually priced sites, not just AG1 and AG2. Decision extended: Add clause 3, under Description of when this protocol applies to: [A distributor may, but is not required to, use this protocol when notifying changes to delivery prices for individually priced ICPs]. Rational: Adds functionality and clarity without taking away from how this protocol is currently used.	Nova: Nova requests clearer, network specific definitions of Group 3 and above, based on each network company’s own price category structures. Given the variability in network pricing methodologies, a standardised explanation or mapping would materially assist interpretation and implementation. Decision: No action Rational: Network pricing is driven by different meter thresholds, category structures and pricing design. Standardising or mapping differences between network prices is outside the scope of this work.	Nova: Seek clarification on the definition of Groups 1 and 2. It appears that residential and small commercial gas sites may not be required for inclusion in GIEP12 submissions. If this interpretation is correct, clarification requested: Whether retailers are expected to receive pricing for these groups through a different channel; and Decision: No action. Rational: The protocol remains the channel for residential and small commercial gas sites. Clarification below distinguishes between the Electricity and Gas frameworks. Potential interpretation misalignment between Electricity and Gas. Electricity: This protocol applies to Category 1 and Category 2 meter installations, which cover small commercial and residential customers. These customers must comply with the protocol unless otherwise agreed. Gas: The equivalent categories in gas are Allocation Groups (AG) 3, 4, 5, and 6, which also represent small commercial and residential customers. Clarification 1: Large TOU gas customers may use this GIEP on an optional basis. This reflects their typically bespoke, individually negotiated pricing arrangements. Clarification 2: Residential and small commercial gas customers (AG3–AG6) are still required to use this protocol unless otherwise agreed or individually priced. These customers generally operate under standard published pricing category codes and rates. If so, what that channel is and how it aligns with the objectives of GIEP12. Decision: Answered above.	Nova: Nova understands that GIEP12 is primarily applicable to network companies and is conceptually similar to the electricity EIEP12 pricing files provided by electricity networks to retailers. It would be useful if the GIC could clarify: Whether GIEP12 submissions are limited to network companies only; Decision: No action Rational: Yes, GIEP12 is limited to network companies only. i.e. the information flow is limited to Distributor => Retailer'. To notify the retailer of changes to network prices. How pricing information from meter owners is intended to be communicated, particularly where networks remain major meter owners. Decision: No action Rational: MEP pricing is a separate charge. The delivery price should reflect the distributors published delivery price schedule (and associated notes and/or pricing policy, as applicable). Specifically, will MEP pricing be provided via GIEP12, separate gas protocol or an alternative communication channel? Decision: No action Rational: Not unless there is a request put forward by participants to be added into our change register to consult on for future amenemdsnts. This is currently outside the scope of this work.	Nova: Individually priced large commercial and industrial sites. Nova assumes that GIEP12 will include pricing for individually priced large commercial and industrial sites. Decision: No action Rational: All individually priced sites can use GIEP12, this will apply across all allocation groups as determined between participants and their UoSAs. If so, we assume the price category field (e.g. “G12”) would be replaced with an individual ICP identifier. In that case, the current Char(4) field length would be insufficient. We suggest that this field length be expanded to accommodate ICP identifiers where individual pricing applies Decision: No action Rational: As done in electricity protocols, and as done by all other gas distribution businesses, individually priced sites should be assigned their own unique price category code, as is typically done across all other distributors in gas. The risk of having interchangeable Price Category Code with ICP is it would shift the purpose of this protocol from ,tariff change notification to contract price communication. GIEP12 (as done in electricity) primary purpose is to communicate published delivery prices, and individually priced sites are already dealt with via bilateral agreements. Individual tariffs are therefore a secondary function	Bluecurrent: No issues Decision: No action Genesis: We support this. Decision: No action Is missing tarrif code (network price component code). Decision: No action Rational: Network price component code is excluded from this protocol. In electricity, there is a Price Category Code for the tariff which is a fixed/variable field for how the charge behaves; and a Network Price Component Code (e.g. capacity reservation charge, peak load charge). In gas, we only have fixed (i.e. daily) or variable (usage) charges. We do not have capacity reservation changes, or peak load charges etc. Therefore Network Price Component Codes are redundant for gas. Vector: Supports standardisation and alignment with published delivery price schedules. No action.
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Operational feedback GIEP13B - Summary consumption information - Retailer to consumer or consumer's agent

Greymouth: If these voluntary guidelines were to be followed, scarce skilled resource would be swamped in administrative tasks rather than serving gas to the market. Having to respond within 2 or 5 business days on consumption information requests would make this a high priority (when it is a low priority).	Greymouth: Greymouth considers GIEP 13, 13B and 13C are problematic and should not progress. If GIC wants to progress, Greymouth requests an industry workshop to discuss.	Greymouth: These GIEPs gloss over fundamental principal-agent issues. A consumer may seek to appoint an agent, perhaps via a letter of authority, but the arrangements may not be acceptable to retailers without safeguards. Unless agency arrangements are explicitly addressed in supply contracts, letters of authority will not bind agents to the third-party confidentiality obligations of the principal nor ensure that the principal takes full liability for its agent’s actions. What is required is a tripartite agency agreement between the principal, agent, and retailer. Absent that, the retailer, who has the final say in the GIEPs, may not recognise the agent for legitimate confidentiality and liability management reasons.	Greymouth: Finally, it is a most unusual policy solution for a competing retailer to be the agent of a consumer. Fundamental principal-agent issues are best dealt with by the market, not in voluntary protocols.	Genesis: Missing Version # in header row
Decision: 1.Amend document to provide for operational and resourcing practicalities. 2. Keep timelines in there as a baseline considering most participants operate to these in electricity.	Decision: No action	Decision: No action	Decision: No action	Decision: Add GIEP version number
Rational: These are voluntary protocols. The timing was not raised as an issue by any other participant. Duel fuel parties all work to 2 and 5 days in electricity already. Wording amendments should cater to both.	Rational: Needs to be more then a single participant to warrant industry getting together to workshop. In electricity, this protocol is regulated under the electricity code, and therefore duel fuel participants are already using it.	Rational: GIEPs are procedural data exchange protocols and are not intended to establish tripartite contractual arrangements. A letter of authority provides evidence of customer consent, with retailers retaining discretion over data release and managing associated risks through their contractual and internal processes. This approach is consistent with electricity protocols.	Rational: The proposal enables consumers to request their own consumption data by appointing their current retailer as an authorised agent.	Rational: Needed for consistency across protocols and for ease of use and reference for participants.
There is no gas registry field for retailer and the policy solution (which does not have a policy problem) incorrectly assumes that the retailer in the gas registry will always be the retailer of the consumer.	GIEP13B is not limited to domestic advanced smart meters per the consultation document. Even if they were, that would cause confusion as definitions for advanced smart meters have yet to be added to the relevant legislation.	Secondly, a non-disclosure agreement may be required between the retailer and the agent. Otherwise, retailers may not have the means to ensure that only the agent (or principal) receives and uses the information.	While this introduces principal–agent considerations—including where the agent is a competing retailer—these issues are not unique to this protocol and are already managed through existing contractual, privacy, and commercial arrangements between consumers, agents, and retailers.	Needs a Response Code in Detail level, not the Header level (this bit is also wrong in EIEP13b)
Decision: No action.	Decision: No action.	Decision: No action.	The GIEPs are procedural data exchange protocols and are not intended to establish or govern agency relationships or liability frameworks. Introducing such provisions would extend beyond their intended scope and risk duplicating or conflicting with existing contractual mechanisms.	Decision: No action
Rational: The issue raised in unclear, referring both to the absence of a retailer field in the registry and to the inaccuracy of such a field.	Rational: This protocol is not specific to advanced gas meters, but does enable the consumer to request more granular data if they have an advanced gas meter. Definition for advanced smart meters do not play a roll in how this protocol functions because this is determined by the availability of the data that a meter provides.	Decision: No action	Participation in the protocol is voluntary, and retailers retain discretion over how they recognise and respond to agent requests. This enables participants to manage any residual risks through their own processes and agreements.	Rational: The response code in the EIEP13B header reflects the acceptance or rejection of a file as a whole. Shifting it to the detail level, you end up with partial acceptance of detail level records, with no overarching flag of whether the file is accepted in totality.
The ojective is to enable consumer access to advanced gas meter data.	Having a carve out from GIEP13B if information is provided on a website portal overlooks the fact that this information would already be provided in invoices (which should be within the carve-out), defeating the need for the protocol. This proposal will burden gas retailers with work producing information in a particular format that the consumer holds.	Rational: These matters relate to contractual risk allocation between parties and are not within the scope of GIEPs. It is appropriate for retailers and agents to determine the need for such arrangements.	On balance, principal–agent issues are more effectively addressed through market mechanisms and bilateral arrangements rather than prescriptive rules within a voluntary protocol.	Nova: Nova confirms that, consistent with our electricity processes, we have for some time treated all gas GIEP13 requests in line with the five business day response requirement, and this will continue.
	Decision: No action		Genesis: A recent development in the EIEP space may be worth considering with GIEP. The use of DateTime fields in EIEP files is currently DD/MM/YYYY HH:MM:SS. The recent EA consultation on EIEP14 files has proposed adopting the ISO 8601 format (YYYY-MM-DD HH:MM:SS+TZ) to align with API standards and NZ government mandated standards. ISO 8601 is more machine friendly and less user friendly, and the inclusion of timezone information unnecessary given all dates and times used by the industry are NZDT in summer and NZST in winter.	Decision: No action
	Rational: The purpose of GIEP13B is to provide a consistent and standardised mechanism for consumers to access AGM consumption data in a usable and comparable format, regardless of how retailers currently present that information. While participants may provide information through alternative channels (e.g. invoices or portals), the protocol ensures a common minimum standard. Participation remains voluntary, and retailers can continue to meet consumer needs through other arrangements.		Decision expanded: Log new data format in protocol change register for future consultation.	Decision: No action
			Rational: EIEP13 does not yet have this date format. Considering it was not consulted on in the current consultation, it will be added to the change log for future consideration.	Rational: Supports the 5 day deadline as per already occursin in electricity.
				Vector: Vector is supportive. We support clear, auditable processes for consumer and agent requests, including identify verification and response timeframes.
				Decision: No action
				Rational: Supports the 5 day deadline as per already occursin in electricity.

Operational feedback - GIEP13C - Request file for GIEP13B - Consumer's authorised agent (i.e. current retailer) to retailer (i.e. previous retailer)

Greymouth: Significant Principal-Agent Issues These GIEPs gloss over fundamental principal-agent issues. A consumer may seek to appoint an agent, perhaps via a letter of authority, but the arrangements may not be acceptable to retailers without safeguards. Unless agency arrangements are explicitly addressed in supply contracts, letters of authority will not bind agents to the third-party confidentiality obligations of the principal nor ensure that the principal takes full liability for its agent’s actions. What is required is a tripartite agency agreement between the principal, agent, and retailer. Absent that, the retailer, who has the final say in the GIEPs, may not recognise the agent for legitimate confidentiality and liability management reasons. Decision: No action. Covered in GIEP13B. Rational: GIEPs are procedural data exchange protocols and are not intended to establish tripartite contractual arrangements. A letter of authority provides evidence of customer consent, with retailers retaining discretion over data release and managing associated risks through their contractual and internal processes. This approach is consistent with electricity protocols.	Genesis: Missing Version # in header row Decision: Add GIEP version number Rational: Needed for consistency across protocols and for ease of use and reference for participants. If Consumer # not available, then file should be rejected. Null should not be an option. Decision: Amend Validation Rule column, text. Rational: This field is mandatory (M). Null, which is used interchangeably here with Blank, would be contradictory to a mandatory field. If “Can be blank” is acceptable then the requirement should be changed from Mandatory to Conditional (also wrong in EIEP13c). Decision: Update the following feilds to (C) - Install address unit - Install address number - Install address street - Install address suburb - Install address PO BOX/RD - Install address town - Install address postcode - Install address country Rational: If blank is currently in the protocol than it	Genesis: Third party agent details and codes need to be listed on the Gas Registry so that Traders can verify parties, and contact them if necessary. Decision: Ensure that processes are in place to allow third party agents to get access to the registry specifically for the listing of their details and for sending and receiving files over GIEP transfer system. Update GIEP13C.docx and Request_for_consumer_consumption_information.docx accordingly. Rational: Extends use of GIEP transfer system to third party agents and provides a mechanism to contact and verify agents. In electricity, third party agents can apply to recieve a Registry identifier on the EA website under Participant register to gain access to the Registry to request and recieve data. However, verification of agents sending the request remains the responsablity of the retailer. Gas Industry Co will follow this approach. Additional comment: Greymouth and Energy Bridge are gas only, therefore we need a seperate pathway to include gas only participants and agents. Otherwise, we could have piggybacked off electricity for this one. Additional comments: Do third party agents have access to the EIEP transfer system? <u>(yes)</u> . Are agents approved and listed by EA? <u>(yes)</u> . Confirmed this with consumer.mobility@EA.govt.nz	Genesis: The inclusion of the customer’s install address fields is not necessary if the ICP and consumer number are provided. These fields will be proposed to be removed from EIEP13C. Decision: No action. Include in change register. Rational: The inclusion of customer install address fields is not necessary where the ICP and consumer number are provided. However, retaining these fields provides additional verification and does not reduce the functionality of the protocol. While removing the fields would reduce data entry, this change was not consulted on during this round. The proposal will therefore be recorded in the change register for consideration in future amendments. We have made these fields conditional as a starting point based on Genesis earlier comment. Nova: The only capability not currently automated is the auto-download of GIEP13C files, similar to the existing EIEP13C process used for electricity. This is a technical enhancement we understand could be implemented, subject to final protocol specifications Decision: No action.	Vector: Consumer consumption information and request formats. Vector is supportive. We support clear, auditable processes for consumer and agent requests, including identify verification and response timeframes. Decision: No action Rational: Participant is showing support for consumer consumption data being made available.
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